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SETH A. GOLDBERG
DIRECT DIAL: +1 215 979 1175
PERSONAL FAX: +1 215 689 2198
E-MAIL: SAGoldberg@duanemorris.com

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April 9, 2021

VIA ECF & EMAIL

Hon. Thomas I. Vanaskie
Special Master
Stevens & Lee, PC
1500 Market St., East Tower, Suite 1800
Philadelphia, PA 19103-7360
TIV@stevenslee.com

Re: MDL No. 2875

Dear Judge Vanaskie:

This responds to Plaintiffs' letter regarding the translation of English documents to Chinese.

Just as Judge Schneider did not require Plaintiffs to disclose documents they translated from English to Chinese in advance of a deposition because doing so would reveal Plaintiffs' work product, any translations of ZHP documents commissioned by counsel for ZHP would be work product that should not be required to be disclosed to Plaintiffs. That said, counsel for ZHP has not

DUANE MORRIS LLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196

PHONE: +1 215 979 1000 FAX: +1 215 979 1020

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commissioned the translation of any English documents into Chinese. Responsive documents translated by the ZHP Parties during the ordinary course of business were produced just like any other responsive document, but, as we have informed Plaintiffs, we are in no better position of identifying those documents in the ZHP Parties' production than Plaintiffs.

We would be happy to have a call with the Court this weekend, if necessary, but there seems to be no reason for the Court to reconvene the parties on this issue at this time.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
Jessica Priselac, Esq. (*via email, for distribution to Defendants' Counsel*)
Sarah Johnston, Esq. (*via email*)
Jeffrey Geoppinger, Esq. (*via email*)
Lori G. Cohen, Esq. (*via email*)
Clem C. Trischler, Esq. (*via email*)